

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

The entire digital contents of Dropbox account(s) associated
with Norman R. Tillema, Jr., that is stored at premises
controlled by Dropbox, Inc. See Attachment A.

Case No. 17-948M(NJ)

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

The entire digital contents of Dropbox account(s) associated with Norman R. Tillema, Jr., that is stored at premises controlled by Dropbox, Inc. See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B.


The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. § 2252A

The application is based on these facts: See attached affidavit.

- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

FBI TFO Dickson Woo,

Printed Name and Title

Sworn to before me and signed in my presence:

Date: October 20, 2017



Judge's signature

City and State: Milwaukee, Wisconsin

Hon. Nancy Joseph

U.S. Magistrate Judge

Printed Name and Title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT

I, Dickson Woo, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with certain accounts that is stored at premises owned, maintained, controlled, or operated by Dropbox, Inc., an online, electronic file storage provider headquartered at 185 Berry Street, 4th Floor, San Francisco, California 94107. The information to be searched is described in the following paragraphs and in Attachment A. This affidavit is made in support of an application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A) to require Dropbox, Inc. to disclose to the government records and other information in its possession pertaining to the subscriber or customer associated with the accounts, including the contents of communications.

2. I am a Task Force officer with the Federal Bureau of Investigation (FBI), and have been since January, 2015 I am assigned to the FBI's Child Exploitation Task Force, Milwaukee Division. My duties include investigating violations of federal criminal law, including violations of Title 18, United States Code, Section 2252, which criminalizes accessing with intent to view, possession, receipt, and distribution of child pornography. I have gained experience in conducting these investigations through training and through everyday work, to include executing search warrants and conducting interviews of individuals participating in the trading and manufacturing of child pornography. I have also received training relating to the investigation of Internet Crimes Against Children (ICAC) which includes training in the investigation and enforcement of state and federal child pornography laws in which computers

and other digital media are used as a means for receiving, transmitting, and storing child pornography.

3. As a Federal Task Force officer, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States. In particular I investigate violations of Title 18, United States Code, Sections 2251 and 2252A which criminalize, among other things, the production, advertisement, possession, receipt, and transportation of child pornography.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

5. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 2252A have been committed by Norman Tillema. There is also probable cause to search the information described in Attachment A for evidence of these crimes and contraband or fruits of these crimes, as described in Attachment B.

PROBABLE CAUSE

6. Over the course of several days in September 2015, a Washington Field Office (WF) under cover employee (UCE) communicated with an individual on Kik (username seedmenorwich), who was later identified as JOSEPH CHRISTOPHER BROWN. BROWN advertised child pornography to the UCE by providing the UCE with access to two box.com accounts that contained approximately 14.5GB of child pornography.

7. On September 17, 2015, BROWN was arrested at his residence and provided information as to his child pornography activities. BROWN informed that there are several individuals on his Kik account contact list that distribute child pornography and may be hands on offenders.

8. Beginning in October 2016, after reviewing BROWN's communications with his Kik contacts, UCE-4714-SAC began using BROWN's Kik account to communicate with individuals who were contacts of BROWN's and/or in Kik groups that BROWN belonged to that appeared to have an interest in children and/or child pornography.

9. An individual using the Kik username "normthunder", display name of "Norm Thunder" is a member of the Kik chat group called "Young vid trade". This individual was invited by another member and joined the chat on 11/16/2016. Individuals in this group posted Dropbox links that contained child pornography and/or embedded child pornography in the group chat. This individual posted comments that indicated he had sexual contact with his 15 year old cousin when he was 22 years old. This individual states he is in Wisconsin. Additionally, this individual commented on the child pornography posted in the chat and asked, "Anyone have some taboo pics?", "Any 14ish?", "Time to jack off" and "awesome thanks for sharing". This individual left the group on 12/02/2016.

10. During one chat on 11/18/16 @ 1755 hours a user named "Anthony Hicks" posted the following dropbox link:

[https // www.dropbox.com/sh/6c4xd6ud28d19ea/AABToflp8lGQyiFBD_vEKRxra?dl=0](https://www.dropbox.com/sh/6c4xd6ud28d19ea/AABToflp8lGQyiFBD_vEKRxra?dl=0)

"Norm Thunder" commented to the link, "Awesome thanks for sharing".

11. On 02/28/2017, an Administrative Subpoena was served on Kik requesting subscriber information associated with username normthunder. On 03/01/2017, Kik responded and provided the following information:

Username: normthunder

Display name: Norm Thunder

Email: norm_tillema@yahoo.com (confirmed)

12. On 03/30/2017, an Administrative Subpoena was served on Yahoo requesting subscriber information associated with the email address provided by Kik. On 05/23/2017, Yahoo responded and provided the following information:

Email: norm_tillema@yahoo.com

Name: Norm Tillema

Address: Juneau, WI 53039

Alternate email address: xxx691968@yahoo.com

Login in IP address: 184.20.123.59 (January – March, 2017)

13. Upon receipt of this information, the suspected user of Kik account normthunder was identified as Norman Ralph Tillema JR (white male 6'2" 300lbs; DOB: 10/11/1968; SSN: 394-90-8843; Wisconsin driver's license: T4506366837108) of W7250 County Road KW, Juneau WI 53039.

14. On August 11, 2017 an administrative subpoena was served on Dropbox requesting subscriber information associated with Norm Tillema. On September 5, 2017 Dropbox responded and provided the following information:

Name: Norm Thunder

Email: norm_tillema@yahoo.com

User ID: 595566798

Joined: Thu, 18 Aug 2016 14:51:09 GMT

Subscription Status: Unpaid

Mobile Information

TIMESTAMP (UTC) IP MODEL CARRIER

2017-03-05 10:17:19 GMT

IP Address 184.20.123.59

Model SM-G920P | Extended Network |

15. A check through Arin.net showed IP Address 184.20.123.59 was associated to Viasat, Inc located at 6155 El Camino Road, Carlsbad, CA 92011.

16. On July 13, 2017, I conducted open source records checks. Based on these checks, I determined that Norman R. Tillema Jr lives at W7250 County Road KW, Juneau WI 53039 and **telephone numbers: 920-296-8216, 920-318-1241, 920-318-2786.**

17. Based on the information received from KIK, Yahoo, and the chat posted by "Norm Thunder" between 11/16/16 and 12/06/16 in paragraphs 9 and 10 and the open source record checks, I believe the user "Norm Thunder" to be Norman R. Tillema Jr.

18. “Dropbox” refers to an online storage medium on the internet accessed from a computer or electronic storage device. As an example, online storage mediums such as Dropbox make it possible for the user to have access to saved files without the requirement of storing said files on their own computer or other electronic storage device. Dropbox is an “offsite” storage medium for data viewed at any time from any device capable of accessing the internet. Users can store their files on Dropbox and avoid having the files appear on their computer. Anyone searching an individual’s computer that uses Dropbox would not be able to view these files if the user opted only to store them at an offsite such as Dropbox. These are often viewed as advantageous for collectors of child pornography in that they can enjoy an added level of anonymity and security.

19. Dropbox provides a variety of online services, including online storage access, to the general public. Dropbox allows subscribers to obtain accounts at the domain name www.dropbox.com. Subscribers obtain a Dropbox account by registering with an email address. During the registration process, Dropbox asks subscribers to provide basic personal identifying information. This information can include the subscriber’s full name, physical address, telephone numbers and other identifiers, alternative e-mail addresses, and, for paying subscribers, means and source of payment (including any credit or bank account number).

20. When the subscriber transfers a file to a Dropbox account, it is initiated at the user’s computer, transferred via the Internet to the Dropbox servers, and then can automatically be synchronized and transmitted to other computers or electronic devices that have been registered with that Dropbox account. This includes online storage in Dropbox servers. If the subscriber does not delete the content, the files can remain on Dropbox servers indefinitely. Even

if the subscriber deletes their account, it may continue to be available on the Dropbox servers for a certain period of time.

21. Online storage providers typically retain certain transactional information about the creation and use of each account on their systems. This information can include the date on which the account was created, the length of service, records of log-in (i.e., session) times and durations, the types of service used, the status of the account (including whether the account is inactive or closed), the methods used to connect to the account, and other log files that reflect usage of the account. In addition, online storage providers often have records of the Internet Protocol address ("IP address") used to register the account and the IP addresses associated with particular logins to the account. Because every device that connects to the Internet must use an IP address, IP address information can help to identify which computers or other devices accessed the account.

22. In some cases, Dropbox account users will communicate directly with Dropbox about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. Online storage providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records of any actions taken by the provider or user as a result of the communications.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

23. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Dropbox, Inc. to disclose to the government copies of the records and other information, including the content of communications, particularly described in Section I of

Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

24. Based on the forgoing, I request that the Court issue the proposed search warrant because there is probable cause to believe that evidence of a criminal offense, namely, a violation of 18 U.S.C. § 2252A, is located within Dropbox account(s) associated with Dropbox link files, which are more fully described in Attachment A, which is incorporated herein by reference.

25. This Court has jurisdiction to issue the requested warrant because it is “a court of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . . that – has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).

26. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

ATTACHMENT A

Property to Be Searched

The property to be searched is the entire digital contents of the Dropbox account(s) associated with the following Dropbox link files and/or subscriber name:

1. [https // ww.dropbox.com/sh/6c4xd6ud28d19ea/AABToFlp8lGQyiFBD_vEKRxra?dl=0](https://www.dropbox.com/sh/6c4xd6ud28d19ea/AABToFlp8lGQyiFBD_vEKRxra?dl=0)
2. Norman R. Tillema Jr of W7250 County Road KW, Juneau WI 53039, telephone numbers: 920-296-8216, 920-318-1241, 920-318-2786, email address of norm_tillema@yahoo.com and user name of Norm Thunder.

and all its associated services including deleted files and e-mails; IP addresses and associated dates/times used to access the e-mail account; that is/are stored at premises owned, maintained, controlled, or operated by Dropbox, Inc., headquartered at 185 Berry Street, 4th Floor, San Francisco, CA 94107.

ATTACHMENT B

Particular Items to be Seized

I. Information to be disclosed by Dropbox, Inc.

To the extent that the information described in Attachment A is within the possession, custody, or control of Dropbox, including any messages, records, files, logs, or information that have been deleted but are still available to Dropbox or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Dropbox is required to disclose the following information to the government for each account or identifier listed in Attachment A:

a. The contents of all folders associated with the account, including stored or preserved copies of files sent to and from the account, the source and destination addresses associated with file, and the date and time at which each file was sent;

b. All transactional information of all activity of the Dropbox accounts described above, including log files, messaging logs, records of session times and durations, dates and times of connecting, and methods of connecting: and emails “invites” sent or received via Dropbox, and any contact lists.

c. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the types of service utilized, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

e. All records pertaining to communications between Dropbox and any person regarding the account or identifier, including contacts with support services and records of actions taken.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 2252A involving the account(s) associated with the Dropbox link files referenced in Attachment A pertaining to the possession and distribution of child pornography images and/or videos. Notwithstanding 18 U.S.C. § 2252/2252A or any similar statute or code, Dropbox, Inc. shall disclosure responsive data by sending it to the address below.

III. Method of delivery

Items seized pursuant to this search warrant can be served by sending, on any digital media device, to TFO Dickson Woo at: Federal Bureau of Investigation, 3600 South Lake Drive, St. Francis, Wisconsin 53235.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
BUSINESS RECORDS PURSUANT TO FEDERAL RULE
OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Dropbox, Inc. and my official title is _____. I am a custodian of records for Dropbox, Inc. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Dropbox, Inc., and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Dropbox, Inc.; and
- c. such records were made by Dropbox, Inc. as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature